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May 20, 2022

**VIA ECF**

Honorable Lorna G. Schofield  
Southern District of New York  
500 Pearl Street  
New York, New York 10007  
(212) 805-0288

**LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE**

**Re: Case 1:22-cv-01078-LGS J.E. et al. v. NYCDOE**

Application GRANTED. Plaintiffs' deadline to  
file a motion for attorneys' fees is extended  
to June 10, 2022.

Dear Judge Schofield,

Dated: May 24, 2022  
New York, New York

I am writing Your Honor to request a concomitant three week extension of Plaintiff's time to move for summary judgment on their fee claim. We previously moved on Defendant's behalf on an extension because Defendant's counsel and his entire family had COVID-19. Your Honor extended Defendant's time to respond but did not extend Plaintiff's time to make a motion. Accordingly, we respectfully request that extension at this time. Based on my discussions with Mr. Frank before he and his family became ill, I have every reason to believe that Mr. Frank and I will come to terms on the fee issue so that we may obviate the need for Your Honor to do anything in this case other than mark this matter as "settled". The last thing that I want to do is to prepare and submit an additional set of motion papers that will expose Defendant to further "fees on fees". The parties will surely put this additional time to good use.

Respectfully submitted,

s/ *Gary S. Mayerson*  
Gary S. Mayerson

cc: Philip Frank, Esq.